

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ASHLEY COOK, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

AMAZON SERVICES.COM, LLC,

Defendant.

Case No. 2:25-CV-00050-JHC

STIPULATED MOTION TO EXTEND
DEADLINE TO AMEND THE
COMPLAINT AND SET BRIEFING
SCHEDULE AND ORDER

STIPULATION

Pursuant to Local Rules 7(d)(1) and 10(g), Plaintiff Ashley Cook and Defendant Amazon Services.com, LLC, (“Amazon”) (together, the “parties”) hereby jointly stipulate as follows:

1. Plaintiff filed this action on January 8, 2025 (Dkt. #1).
2. The Court issued a Summons on January 13, 2025 (Dkt. #2).
3. Plaintiff served the Summons and Complaint on Amazon on January 14, 2025.¹
4. Defendant responded to the Complaint on February 25, 2025 and moved to dismiss (Dkt. # 13).

¹ The Complaint was filed against “Amazon Services.Com, LLC.” That entity does not exist, but appears to be an erroneous reference to Amazon.com Services, LLC. The Complaint was served upon the registered agent for the latter entity. Amazon reserves all rights as to the identity of the correct defendant.

1 5. The parties agreed by stipulation that Plaintiff would have 28 days after the filing
2 of such motion to file an opposition, and Defendant would have 14 days after the filing of
3 Plaintiff's opposition to file a reply brief (Dkt. # 8).

4 6. Plaintiff, upon considering the motion to dismiss, believes that an amendment could
5 resolve some, if not all, of the pending items.

6 7. Plaintiff's deadline to amend is March 18, 2025, *see* Fed. R. Civ. P. 15(a)(1)(B),
7 but the opposition to the motion to dismiss is not due until March 25, 2025, *see* Dkt. # 9.

8 8. The parties have conferred and agree to stipulate, and seek an order that, Plaintiff
9 may amend her complaint by April 1, 2025. The parties further stipulate to extend the time in
10 which to respond to the forthcoming amended complaint to May 1, 2025. In the event that
11 Defendant files a motion under Rule 12 or other applicable provision, the parties also agree that
12 Plaintiff shall have 28 days after the filing of such motion to file an opposition, and Defendant
13 shall have until 14 days after the filing of Plaintiff's opposition to file a reply brief.

14 9. No scheduling order has been entered in this case, so this motion would not affect
15 any other scheduled dates in the proceeding.

16 RESPECTFULLY SUBMITTED this 18th of March, 2025.
17
18
19
20
21
22
23
24
25
26

By: s/ Michael C. Subit

Michael C. Subit, WSBA #29189

FRANK FREED SUBIT & THOMAS

705 Second Avenue, Suite 1200

Seattle, WA 98104-1729

Telephone: 206-682-6711

Email: Msubit@frankfreed.com

Attorneys for Plaintiff

Evan K. Richardson (*pro hac vice*)

HARMAN GREEN PC

824 Exposition Avenue, Suite 8

Dallas, TX 75226

Tel: 646-248-2288

Email: Erichardson@theharmanfirm.com

Walker G. Harman, Jr. (*pro hac vice*)

HARMAN GREEN PC

824 Exposition Avenue, Suite 8

Dallas, TX 75226

Tel: 646-248-2288

Email: Wharman@theharmanfirm.com

*Counsel for Plaintiff and the
Proposed Putative Class*

By: s/ Shannon McDermott

Andrew E. Moriarty, Bar No. 28651
Shannon McDermott, Bar No. 59455
Perkins Coie LLP
1201 Third Avenue, Suite 4900
Seattle, Washington 98101-3099
Telephone: +1.206.359.8000
Facsimile: +1.206.359.9000
AMoriarty@perkinscoie.com
SMcDermott@perkinscoie.com

Lauren M. Blas (*pro hac vice*)
Gibson, Dunn & Crutcher LLP
333 South Grand Avenue
Los Angeles, California 90071-3197
Telephone: 213.229.7000
Facsimile: 213.229.7520
LBlas@gibsondunn.com

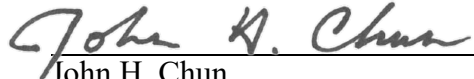
Jason C. Schwartz (*pro hac vice*)
David A. Schnitzer (*pro hac vice*)
Gibson, Dunn & Crutcher LLP
1700 M Street NW
Washington, D.C. 20036-4504
Telephone: 202.955.8500
Fax: 202.467.0539
jschwartz@gibsondunn.com
dschnitzer@gibsondunn.com

Attorneys for Defendant

ORDER

Based upon the foregoing Stipulation, **IT IS SO ORDERED.**

DATED this 19th day of March, 2025.



John H. Chun
United States District Judge